

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ROBERT MENENDEZ, *et al.*,

Defendants.

Criminal Action No. 23-490 (SHS)

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**NOTICE OF OMNIBUS PRETRIAL
MOTIONS**

PLEASE TAKE NOTICE that Defendant Wael Hana hereby moves before the Honorable Sidney H. Stein, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for the entry of an order dismissing Counts 1, 2, and 4 of the Second Superseding Indictment (ECF No. 115) [the “Indictment”], or in the alternative (a) striking superfluous allegations in Paragraph 15 from the Indictment, (b) ordering the Government to produce a bill of particulars; (c) suppressing evidence seized pursuant to certain search warrants issued to Mr. Hana’s electronic accounts and devices; and (d) ordering a *Franks* hearing with regard to whether evidence obtained as a result of certain other search warrants should be suppressed.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant Mr. Hana shall rely upon the accompanying Memorandum of Law in Support of Omnibus Pretrial Motions, Declaration of Lawrence S. Lustberg, with exhibits appended thereto, and Declaration of Wael Hana.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Mr. Hana also joins in all applicable motions filed by his co-defendants.

Dated: January 15, 2024

Respectfully submitted,

s/ Lawrence S. Lustberg
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